

UNITED STATES DISTRICT COURT

for the
Western District of Washington

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)
Video System stored at the premises controlled by
Ring, LLC, more fully described in Attachment A

Case No. MJ23-361

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Video System stored at the premises controlled by Ring, LLC, more fully described in Attachment A, incorporated herein by reference.

located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
18 U.S.C. §§ 113(a)(8) & 1153(a)

Offense Description
Assault by Strangulation

The application is based on these facts:

- ☒ See Affidavit of FBI SA Natalie Leavitt, continued on the attached sheet.

- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.



Applicant's signature

Natalie Leavitt, FBI Special Agent

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 07/18/2023



Judge's signature

City and state: Seattle, Washington

S. Kate Vaughan, United States Magistrate Judge

Printed name and title

I, NATALIE LEAVITT, a Special Agent with the Federal Bureau of Investigation,
being first duly sworn, hereby depose and state as follows:

1. I make this affidavit in support of an application for a search warrant for information associated a Ring Video Doorbell system in use at 2767 Lummi Shore Road, Bellingham, Washington, 98226 (the “Subject Premises”), which is stored at premises owned, maintained, controlled, or operated by Ring, LLC, (“Ring”) a home security products company owned by Amazon.com, Inc. and headquartered in Santa Monica, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), (b)(1)(A), and (c)(1)(A), to require Ring to disclose to the government records and other information in its possession, including video content, pertaining to the Ring system in use at the Subject Premises.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. This affidavit and warrant application are being presented electronically pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3).

JURISDICTION

5. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), & (c)(1)(A). Specifically, the Court is, “a district court of the United States . . . that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

PROBABLE CAUSE

Offense Under Investigation

6. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that JOSEPH MICHAEL QUINCY JEFFERSON (“JEFFERSON”) has violated 18 U.S.C. §§ 113(a)(8) and 1153(a) (Assault by Strangulation). There is also probable cause to search the property described in Attachment A for evidence of this crime further described in Attachment B.

7. On or about April 8, 2023, at approximately 1:00 a.m., Lindsey Hoglund, and a female friend and neighbor, Heidi Solomon, arrived at Lummi Nation Police Department (“LNPD”) and reported that JEFFERSON assaulted and strangled Hoglund. Hoglund described JEFFERSON as her intimate partner and roommate of seven years. During the recorded interview conducted by LNPD Officer Thomas Granger, Hoglund provided the following information. She and JEFFERSON got into an argument in the dining room of their shared residence. JEFFERSON punched Hoglund on the right side of her face and jaw area with his left hand. JEFFERSON then shoved her into a shelving unit. JEFFERSON demanded that Hoglund give him her cell phone, but she refused to do so. JEFFERSON tackled Hoglund and they both fell on the ground. Hoglund landed face down on the floor with JEFFERSON on top of her. JEFFERSON strangled Hoglund by putting his arm around her neck and squeezing. Hoglund scratched and fought to get JEFFERSON off her. She feared she was going to die. Hoglund was not able to breathe and lost consciousness. After Doe regained consciousness and JEFFERSON stopped strangling her, she saw spots. Doe ran out the door of the residence and made her way

1 toward Solomon's house. JEFFERSON followed Hoglund in his vehicle before leaving
2 the area.

3 8. Officer Granger observed petechial hemorrhaging in the upper areas of both
4 of Hoglund's eyes and on her upper cheek areas near her eyes. Granger observed an
5 elliptical-shaped red mark near Hoglund's left clavicle, which appeared to be from a
6 finger, as well as a small scratch on her left shoulder. He also noted red marks on the
7 front and left side of Hoglund's neck and bruising on the front of her neck under her chin.
8 Hoglund reported that both sides of her neck were sore, that it hurt to swallow, and that
9 her voice was hoarse.

10 9. A female friend of Hoglund, Shalynn Cordero, later drove Hoglund to
11 PeaceHealth United General Medical Center in Sedro-Woolley for a forensic examination
12 and medical treatment for her injuries. Hoglund provided the following information to
13 the forensic nurse. JEFFERSON strangled her for about 60-90 seconds before she passed
14 out. When she regained consciousness JEFFERSON's arms were still around her neck.
15 JEFFERSON tightened his grip and strangled Hoglund for another 60-90 seconds,
16 causing her to pass out a second time. When Hoglund regained consciousness, she ran
17 out of the house toward a neighbor's residence. The nurse noted the presence of petechia
18 on both of Hoglund's eyes and behind her left ear, swelling and ligature marks on her
19 neck, painfulness on the outside of her neck upon palpitation, and the presence of
20 abrasions on her knees and left shoulder.

21 10. The LNPd subsequently arrested JEFFERSON and transported him to the
22 Whatcom County Jail. During transport, Officer Granger noticed a scratch mark on the
23 left side of JEFFERSON's neck behind his left ear, about 1 to 2 inches long. On April 9,
24 2023, JEFFERSON called Hoglund 18 times from the Whatcom County Jail. The phone
25 calls were refused or rang until voicemail was activated. None of the call recordings
26 indicated that JEFFERSON left a message on Hoglund's voicemail.

27 11. On May 8, 2023, I interviewed Heidi Solomon. Solomon explained that
28 she was getting ready for bed on April 8, 2023, at around 1:15 a.m. when she heard a

1 vehicle peel out nearby. Solomon looked outside and noticed an individual (later
2 identified as Hoglund) staggering down the street. Hoglund called her from her cell
3 phone. Hoglund initially apologized and said she must have pocket-dialed her. Solomon
4 described Hoglund's voice as hoarse and explained that Hoglund started crying, saying
5 "he did it again" and "this time was bad." Solomon got into her vehicle, picked up
6 Hoglund and drove her to the LNPd station.

7 12. Solomon explained that Hoglund shared the following information with her
8 regarding the incident. She was playing XBOX online with a friend from Sedro-
9 Woolley, Shalynn Cordero. JEFFERSON came home around 1:00 a.m. and was angry
10 with Hoglund, and he unplugged the XBOX. JEFFERSON turned and punched Hoglund
11 in the face. Hoglund retreated to the kitchen and JEFFERSON followed her.
12 JEFFERSON tackled Hoglund to the ground and strangled her until she lost
13 consciousness. Once Hoglund regained consciousness, JEFFERSON strangled her again.
14 After she regained consciousness a second time, Hoglund ran out of the house towards
15 Solomon's residence. Solomon picked Hoglund up and drove her to the tribal police
16 station.

17 13. Hoglund told Solomon that JEFFERSON had strangled her over five times
18 before, but she had not previously reported that he had strangled her. Hoglund had
19 previously come over to Solomon's house after JEFFERSON assaulted her, as she
20 considered it to be a "safe haven." Solomon stayed in contact with Hoglund that morning
21 via text messages. A screen shot from Solomon's cell phone showed the following text
22 message exchange with Hoglund at approximately 4:01 a.m. in which Hoglund referred
23 to law enforcement activity in front of the Subject Premises captured by the Ring camera:

- 24 • Solomon: "He blowing you up" [?]
- 25 • Hoglund: "Yes, he's blowing me up. Cops are there saw em on the ring
26 camera."

27 14. On the evening of May 8, 2023, I received a text message from Solomon
28 following the interview. Solomon shared that JEFFERSON was back with Hoglund at

1 their shared residence and that Hoglund was on the phone with her. I informed the LNPd
2 that JEFFERSON was violating a protection order, and a tribal officer responded to the
3 house.

4 15. On May 16, 2023, I interviewed Theresa Zollner, a female friend of
5 Hoglund. Zollner asked about JEFFERSON, who she identified as her ex-boyfriend.
6 Zollner provided the following information. Zollner spoke with Hoglund after the assault
7 and asked if she was okay. Hoglund told Zollner that JEFFERSON had strangled her
8 twice and that she was lucky to get out of the house alive. Zollner said that JEFFERSON
9 used to beat and strangle her when they dated. She also expressed concerns regarding
10 JEFFERSON's alcohol abuse and his mental health.

11 16. On May 22, 2023, I interviewed Shalynn Cordero, who provided the
12 following information. On the evening of April 7, 2023, Cordero and Hoglund had
13 planned to play XBOX while JEFFERSON was out with friends. As Cordero and
14 Hoglund got online to play, Cordero noticed that Hoglund's username initially showed
15 up, but that the system showed her as offline a couple seconds later. Approximately
16 thirty minutes later, at approximately 1:13 a.m., Hoglund called Cordero and said that
17 JEFFERSON had hit her and that she ran barefoot out of the house. Hoglund told
18 Cordero that she was going to a friend's house, and Cordero said she would drive from
19 her home in Sedro-Woolley and meet Hoglund at the police station. Cordero arrived as
20 Hoglund was wrapping up at the LNPd. Cordero drove Hoglund to a hospital in Sedro-
21 Woolley. She thought that Hoglund would be examined and treated more quickly and
22 that she would be safer in a separate county. Hoglund told Cordero that JEFFERSON
23 had strangled her twice and that he had previously strangled her. Hoglund and Cordero
24 were at the hospital until approximately 9:00 a.m.

25 17. I have confirmed that JEFFERSON is an Indian: he has an Indian blood
26 quantum of 7/8ths and is an enrolled member of the Lummi Nation, a federally
27 recognized Indian tribe. I have also confirmed that the residence where the alleged
28

1 assault occurred is located on tribal trust land within the exterior boundaries of the
2 Lummi Indian Reservation.

3 18. Based on my training and experience, I know that scratches, abrasions, and
4 discoloration to the face and neck, neck and throat pain, difficulty swallowing and
5 talking, loss of consciousness, and a hoarse voice are symptoms of strangulation and are
6 consistent with a strangulation having occurred.

7 19. Based on my training and experience along with communications with
8 other agents, I believe the requested search will provide information on Hoglund and
9 JEFFERSON's whereabouts, physical movements and demeanor before, during and after
10 the assault.

11 20. As part of this investigation, I have conducted surveillance at the Subject
12 Premises and observed a sign in the driveway stating the property was, "under 24 hour
13 video surveillance." I also observed a rectangular device near the front door consistent
14 with the Ring Video Doorbell system.

15 21. On May 8, 2023, the FBI served Ring with a preservation request pursuant
16 to 18 U.S.C. § 2703(f), requiring Ring to preserve all information associated with the
17 Ring system used at the Subject Premises.

18 **Federal Charges and Search Warrant**

19 22. On June 22, 2023, the Honorable Brian A. Tsuchida, United States
20 Magistrate Judge, issued a single-count Complaint and Arrest Warrant charging
21 JEFFERSON with violating 18 U.S.C. §§ 113(a)(8) and 1153(a) (Assault by
22 Strangulation). *See* Docket No. 1. On June 27, 2023, JEFFERSON was arrested and
23 made his initial appearance. *See* Docket No. 5. On June 29, 2023, JEFFERSON had a
24 detention hearing and was ordered released on bond. *See* Docket No. 9. On June 30,
25 2023, the Honorable Michelle L. Peterson, United States Magistrate Judge issued a
26 search warrant for JEFFERSON's cell phone, which was seized as evidence at the time of
27 his federal arrest on June 27, 2023. *See* MJ23-337. On July 5, 2023, a Grand Jury
28 returned a single-count Indictment charging JEFFERSON with violating 18 U.S.C. §§

1 113(a)(8) and 1153(a) (Assault by Strangulation). *See United States v. Joseph Michael*
 2 *Quincy Jefferson*, CR23-0109-LK (Docket No. 13). JEFFERSON is scheduled to be
 3 arraigned on July 18, 2023. Docket No. 19.

4 **Information about Ring**

5 23. From my review of publicly available information provided by Ring about
 6 its services, including Ring's "Privacy Policy" and "Terms of Service," I am aware of the
 7 following about Ring and about the information collected and retained by Ring:

- 8 a. Ring sells products and services designed to see, hear, and speak to anyone
 9 at the customer's door from the customer's computer or mobile device.
- 10 b. Ring obtains content captured and recorded when using Ring's products
 11 and services, such as video or audio recordings, live video or audio streams,
 12 images, comments, and data Ring's products collect from the surrounding
 13 environment to perform their functions (such as motion, events,
 14 temperature, and ambient light).
- 15 c. Ring generally has access to videos only if the user has a current Ring
 16 Protect plan subscription. If users choose to subscribe to a Ring Protect
 17 Subscription Plan, the customer device automatically sends to Ring for
 18 storage any video footage and/or audio recordings captured by Ring
 19 products installed by the customer.
- 20 d. Even if a user does not have a Ring Protect Subscription plan, Ring devices
 21 will automatically record during an answered motion or ring, but those
 22 recordings are not retained unless the user shares them through the Ring
 23 Neighbors feature. The Ring Neighbors feature allows the customer to
 24 publicly share any video footage and/or audio recording captured by Ring
 25 devices with other users through the Ring application. If shared, Ring
 26 Neighbors Recordings are retained regardless of customer participation in
 27 Ring Protect.
 28

- 1 e. Videos are generally retained for no longer than 60 days. For legacy users,
2 video could be retained up to 180 days. At any time during the retention
3 period, a user may delete a video.
- 4 f. Ring asks customers to provide personal information in connection with
5 Ring's products and services. This may include: contact information, such
6 as name, phone number, email, and postal address; account information,
7 such as online password and other log-in details used to access Ring's
8 products and services.
- 9 g. Ring obtains payment information, such as name, billing address and
10 payment card details, including card number, expiration date and security
11 code. Payment information is collected and stored by a third-party payment
12 processor on Ring's behalf; Ring only stores the last four digits of the
13 customer's payment card and the expiration date.
- 14 h. Ring also obtains the geolocation of customers' mobile devices if such
15 customers consent to the collection of this data.
- 16 i. Ring also obtains product setup information, including the name and
17 description of the Ring product and location where it is installed, technical
18 information about the product, including Wi-Fi network information and
19 signal strength, and information about the device's model, serial number,
20 and software version.
- 21 j. Ring also obtains social media handles, content, and other data posted on
22 Ring's official social media page and other personal information contained
23 in content Ring users submit through Ring's "Contact Us" feature or
24 customer support tools on Ring's website or mobile application.

25 **Connection of Ring to the Investigation**

26 24. As explained herein, information stored in connection with a Ring account
27 may provide evidence of the criminal conduct under investigation, thus enabling the
28 United States to establish and prove each element or alternatively, to exclude the innocent

1 from further suspicion. In my training and experience, captured video and audio
2 contents, images, comments, and other data collected by Ring products about the
3 surrounding environment can be evidence of who was present at a particular physical
4 location at a relevant time. This geographic and timeline information may tend to either
5 inculcate or exculpate the Ring account owner or others connected to the crime.

6 25. Based on the information above, Ring's servers are likely to contain the
7 types of material described above, including stored video and audio content and
8 information concerning the use of Ring products and services by Lindsey Hoglund and
9 JEFFERSON. Ring's servers are likely to contain evidence of the physical movements to
10 and from the Subject Premises by Hoglund and JEFFERSON, as well as their conditions
11 and demeanor when arriving and departing the residence during the period in question.
12 In my training and experience, such information may constitute evidence of the crime
13 under investigation.

14 **Information To Be Searched and Things To Be Seized**

15 26. I anticipate executing this warrant under the Electronic Communications
16 Privacy Act, in particular Title 18, United States Code, Sections 2703(a), (b)(1)(A), and
17 (c)(1)(A), by using the warrant to require Ring to disclose to the government copies of
18 the records and other information (including the content of communications) particularly
19 described in Attachment B.

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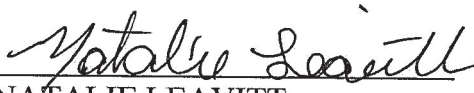
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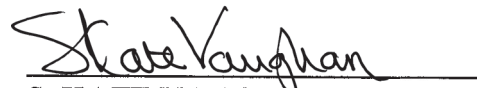
1 **CONCLUSION**

2 27. Based on the foregoing, I request that the Court issue the proposed search
3 warrant.

4 28. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer
5 is not required for the service or execution of this warrant. The government will execute
6 this warrant by serving it on Ring. Because the warrant will be served on Ring, who will
7 then compile the requested records at a time convenient to it, and then reviewed by
8 government-authorized persons, there exists reasonable cause to permit the execution of
9 the requested warrant at any time in the day or night.

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12 
13 NATALIE LEAVITT
14 Special Agent
15 Federal Bureau of Investigation

16 The above-named agent provided a sworn statement attesting to the truth of the
17 contents of the foregoing affidavit by telephone on this 18th day of July 2023.

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21 S. KATE VAUGHAN
22 United States Magistrate Judge
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ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with the video system located at 2767 Lummi Shore Road, Bellingham, Washington 98226, which is stored at premises owned, maintained, controlled, or operated by Ring, LLC, a company owned by Amazon.com, Inc., and headquartered at 1523 26th St, Santa Monica, California.

ATTACHMENT B
Particular Things to be Seized

Information to be disclosed by Ring, LLC

To the extent that the information described in Attachment A is within the possession, custody, or control of Ring, LLC, including videos, communications, records, files, logs, or information that have been deleted, but are still available to Ring, LLC, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Ring, LLC is required to disclose the following to the government:

All video and audio content and all logs and records associated with the content for the account associated with the residence located at 2767 Lummi Shore Road, Bellingham, Washington 98226 from 12:00 pm. (noon) April 7, 2023 until 12:00 p.m. (noon) April 8, 2023, Pacific Time, including stored or preserved copies of such video and audio content;

All data and information that has been deleted by the user from 12:00 pm. (noon) April 7, 2023 until 12:00 p.m. (noon) April 8, 2023.

All identity and contact information, including full name, e-mail address, physical address (including city, state, and zip code), phone numbers, payment and billing information, including billing address and payment card details, and other personal identifiers;

Ring is hereby ordered to disclose the above information to the government within 10 days of issuance of this warrant.

Information to be seized by the government

All information described above that constitutes evidence of a violation of 18 U.S.C. §§ 113(a)(8) and 1153(a) (Assault by Strangulation), involving JOSEPH MICHAEL QUINCY JEFFERSON, and occurring between 12:00 pm. (noon) on April 7, 2023 and 12:00 p.m. (noon) on April 8, 2023, Pacific Time, including, for each account or identifier listed on Attachment A, information pertaining to the following matters:

- 1 1. Evidence of the physical movements of individuals, including when arriving and
2 departing the residence.
- 3 2. Evidence indicating how and when the Ring account was accessed or used, to
4 determine the chronological context of account access, use, and events relating to
5 the crime under investigation and to the Ring account owner;
- 6 3. Evidence indicating the Ring account owner's state of mind as it relates to the
7 crime under investigation.

8 This warrant authorizes a review of electronically stored information,
9 communications, other records and information disclosed pursuant to this warrant in
10 order to locate evidence, fruits, and instrumentalities described in this warrant. The
11 review of this electronic data may be conducted by any government personnel assisting in
12 the investigation, who may include, in addition to law enforcement officers and agents,
13 attorneys for the government, attorney support staff, and technical experts. Pursuant to
14 this warrant, the FBI may deliver a complete copy of the disclosed electronic data to the
15 custody and control of attorneys for the government and their support staff for their
16 independent review.

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**CERTIFICATE OF AUTHENTICITY OF DOMESTIC RECORDS PURSUANT TO
FEDERAL RULES OF EVIDENCE 902(11) AND 902(13)**

I, _____, attest, under penalties of perjury by the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this certification is true and correct. I am employed by Ring, LLC, and my title is _____. I am qualified to authenticate the records attached hereto because I am familiar with how the records were created, managed, stored, and retrieved. I state that the records attached hereto are true duplicates of the original records in the custody of Ring, LLC. The attached records consist of _____ [GENERALLY DESCRIBE RECORDS (pages/CDs/megabytes)]. I further state that:

a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters, they were kept in the ordinary course of the regularly conducted business activity of Ring, LLC, and they were made by Ring, LLC as a regular practice; and
b. such records were generated by Ring, LLC's electronic process or system that produces an accurate result, to wit:

1. the records were copied from electronic device(s), storage medium(s), or file(s) in the custody of Ring, LLC in a manner to ensure that they are true duplicates of the original records; and

2. the process or system is regularly verified by Ring, LLC, and at all times pertinent to the records certified here the process and system functioned properly and normally.

I further state that this certification is intended to satisfy Rules 902(11) and 902(13) of the Federal Rules of Evidence.

Date: _____ Signature: _____